## UNITED STATES DISTRICT COURT

for the

Middle	District	of Ter	nnessee

14	nadic Bistrict of Termessee		
United States of America v.  PATRICK CASH  Defendant(s)	) ) Case No. 23-mj-4422 ) ) )		
CR	IMINAL COMPLAINT		
I, the complainant in this case, state the	at the following is true to the best of my knowledge and belief.		
•	October 6, 2022 in the county of Davidson in the		
	ee, the defendant(s) violated:		
Code Section  Offense Description  18 U.S.C. 875(c)  Communicating a threat in interstate commerce			
This criminal complaint is based on the Please see the attached statement in support			
<b>♂</b> Continued on the attached sheet.			
	/s/ Nathan Livesey		
	Complainant's signature		
	FBI SA Nathan Livesey  Printed name and title		
Attested to by the applicant in accordance with telephone (specify reliable electronic means).  Date: November 6, 2023  City and state: NASHVILLE, 7	Judge's signature		

## STATEMENT OF FACTS IN SUPPORT OF A CRIMINAL COMPLAINT

- 1. Your affiant, Nathan Livesey, is a Special Agent with the Federal Bureau of Investigation (the "FBI") assigned to the Memphis Field Office Nashville Resident Agency. As an FBI Special Agent, I investigate weapons of mass destruction violations and other threats of violent crime. As an FBI Special Agent, I am authorized by law to engage in or supervise the prevention, detention, investigation, or prosecution of violations of Federal criminal laws.
- 2. I make this statement in support of a criminal complaint charging Patrick Allen CASH with violating 18 U.S.C. § 875(c), which makes it unlawful to transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

## **PROBABLE CAUSE**

- 3. On October 6, 2023, the New Prague Area (Minnesota) School District and a New Prague Area School District Employee reported threats they received via voicemail to the New Prague (Minnesota) Police Department. The School District and School District Employee shared the contents of the messages and copies of two recorded voicemails with law enforcement. The School District Employee noted to law enforcement the concerning nature of the voicemails and the threats to the District Employee's family contained in the voicemails.
- 4. The New Prague Area (Minnesota) School District recently found itself in the national headlines based on a video that that was allegedly shown during diversity, equity, and inclusion training that used the analogy of mosquito bites to discuss the topic of microaggressions.
- 5. Law enforcement was able to determine the number of the caller who left the voicemails as (615) 681-7511. Further investigation revealed that this number was registered to and used by Patrick Allen CASH, a Nashville resident, since October 24, 2006. Specifically,

AT&T provided subscriber information and toll records for (615) 681-7511. This information showed that the phone line has been utilized by CASH for approximately seventeen (17) years. A location ping, obtained via an emergency disclosure based on the nature of the threats communicated to the New Prague Area School District and the District Employee, determined that the phone used to make the threats outlined above was in the vicinity of CASH's residential address. CASH's residential address is located in the Middle District of Tennessee.

- 6. CASH placed each of the three calls described below from the same cell phone number, which is registered to him.
- 7. CASH first called the New Prague Area School District Office on October 5, 2023 at 1:09 p.m. During this first call, the school employee who forwarded this voicemail to law enforcement noted that the caller identification function indicated that the call was from Patrick CASH and was made from (615) 681-7511. During this first call, CASH left a voicemail stating, in part:

I am going to fucking kill every single one of you people that fucking work here you fucking nigger loving faggots. Come fucking get me, come fucking get me when I'm shoving my dick down your fucking throat you bitch ass fuck. Fuck you, you fucking sacks of shit. I going to fucking kill y'all. Come fucking get me, come fucking get me, you bitch.

- 8. CASH placed his second call to the New Prague Area School District moments later at 1:12 p.m. and did not leave a message.
- 9. On October 5, 2023, at 1:12 p.m., CASH, using the same phone number, called the desk of a New Prague School District Employee and left the following voicemail message:

Like you, you stupid bitch. Eat fucking shit, I'm going to fucking kill you and your fucking children. Alright, I'm gonna fuck you people up. Alright, you fucking think that you can fucking talk about white people like this. I'm gonna fuck you faggot fucks up. I'm gonna treat you like niggers treat people, alright. I am gonna fucking rob you for

everything that you have and then I am going to fucking kill you for no fucking reason because I'm a nigger. Cause that's how niggers act. You fucking dumb fucking bitch. Go fucking cry about fucking crackhead criminal George nigger Floyd, fuck face Floyd. Go fucking cry about that shit, you fucking nigger loving slut. Like I said, I'll fucking kill you and your whole fucking family and then I'm gonna burn a fucking cross in your fucking front yard, Alright, and then I'm gonna fucking take a piss on your fucking ashes, you nigger loving fucks.

- 10. I have listened to both of the voicemail messages described above. Based on the caller's voice and the similar racial slurs and threats made during each of the two voicemail messages, I have concluded that both voicemail messages were made by the same caller.
- 11. Toll records show that CASH made the three calls described above, as well as numerous other calls to political and governmental offices around the country. Toll records showed that CASH called the following numbers of interest:

## • October 4, 2023

- o 215-686-8000 Philadelphia District Attorney
- o 612-673-2202 Minneapolis City Council Ward 2: Robin Wonsley
- o 612-673-2204 Minneapolis City Council Ward 4: LaTrisha Vetaw
- o 612-673-2205 Minneapolis City Council Ward 5: Jeremiah Ellison
- o 612-673-2206 Minneapolis City Council Ward 6: Jamal Osman
- o 612-673-2207 Minneapolis City Council Ward 7: Robin Lisa Goodman
- o 651-296-8659 Minnesota House of Representatives Rep. Ester Agbaje
- 651-296-3533 Minnesota House of Representatives Rep. Mary Frances
   Clardy
- o 651-296-4342 Minnesota House of Representatives Rep. Brion Curran.

- October 5, 2023
  - o 718-573-1726 New York State Senator Julie Salazar (twice)
  - o 212-349-6460 New York Public Interest Research Group
  - o 212-796-4200 Gothamist LLC (twice)
  - o 312-744-3300 City of Chicago Office of the Mayor
  - o 952-758-1700 New Prague Area School District (on three separate occasions)
  - o 718-241-9330 New York City Council District 46 Mercedes Narcisse
  - o 718-287-8722 New York City Council District 40 Rita Joseph
  - o 718-919-0740 New York City Council District 36 Chi Osse
- 12. The call to the City of Chicago Office of the Mayor contained multiple racial slurs; however, it did not contain any direct threats.
- 13. On October 30, 2023, I, along with another FBI agent, interviewed two former coworkers of CASH who worked with him for approximately six months in 2021. A short portion of each of the threatening messages was played for each co-worker. Each co-worker indicated that the speaker in the threatening messages sounded like CASH.
- 14. On October 31, 2023, I reviewed geolocational data obtained via a ping warrant from October 27-31, 2023, for (615) 681-7511. This data revealed that the phone used to make the threatening calls did not leave a 500-meter radius from the known residence of CASH.
- 15. Based on the foregoing, your affiant submits that there is probable cause to believe that Patrick Allen CASH violated 18 U.S.C. § 875(c), which makes it unlawful to transmit in

